



P.O. Box 1808, McCall, ID 83638
www.savethesouthforksalmon.com

David Hogan
District Ranger
500 N. Mission Street
McCall, ID 83638
david.hogan@usda.gov

Josh Simpson
Recreation Program Manager
500 N. Mission Street
McCall, ID 83638
joshua.simpson@usda.gov

SUBMITTED THROUGH PROJECT WEBPAGE

November 22, 2021

Re: Scoping comment for the East Fork South Fork Restoration and Access
Management Plan Environmental Assessment

Dear David and Josh:

Thank you for the opportunity to comment on the scoping notice for the East Fork South Fork Restoration and Access Management Plan Environmental Assessment (“EFSF RAMP EA”). Save the South Fork Salmon (“SSFS”) is a community-based citizens’ organization, headquartered in Valley County, Idaho, dedicated to protecting the South Fork of the Salmon River watershed, its outstanding and remarkable natural values, and the economies that depend on those values. SSFS’s members and supporters have a strong interest in protecting natural resources, maintaining recreational opportunities and access, and ensuring future generations can enjoy and benefit from these resources and opportunities in the South Fork of the Salmon River watershed. SSFS was established in 2019, and has worked to protect those values through public outreach, education, and advocacy.

The Forest Service's project, in part, proposes to "provide motorized trail opportunities" as well as "improve watershed condition, by decommissioning or obliterating roads, storm damage risk reduction treatments, improving maintenance of roads and trails, and managing dispersed use."

Forest Service regulation 36 C.F.R. Part 212 governs the designation of roads, trails, and areas for motorized use on National Forest System lands, and Subpart B provides the criteria for designation of motorized trails within National Forest System lands. Specifically, section 212.55(b) provides that, when designating motorized trails, the Forest Service

shall consider effects on the following, with the objective of minimizing:

- (1) Damage to soil, watershed, vegetation, and other forest resources;
- (2) Harassment of wildlife and significant disruption of wildlife habitats;
- (3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and
- (4) Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands.

There are numerous tributaries to the EFSF in the project area that not only provide important habitat for threatened and sensitive fish species, but also contribute clear, cold water that is essential for providing and maintaining fisheries habitat in the EFSF. In addition, there are high-altitude wildlife species that may be significantly impacted by the presence and use of motorized trails. Historical mining activity in the EFSF Salmon River watershed has already created the need for continued restoration activities. Minimization of impacts from motorized use on these resources is essential to ensuring that these fish and wildlife species and their habitat are not further threatened.

SSFS was not a part of the Big Creek/Yellow Pine Collaborative, but their recommendations reached a fair consensus that should be considered as an alternative in the Environmental Assessment ("EA"). Although we agree with many of the collaborative's recommendations, we have significant concerns that motorized access may not be balanced with sufficient resource protection actions.

SSFS's specific comments on the proposed project are below:

1. Effects on Fish, Wildlife and Plants.

SSFS recommends that the EA analyze potential direct, indirect, and cumulative effects of the proposed routes on wildlife species such as elk, deer, moose, fisher, Canada lynx, wolverine, mountain goat, Clark's nutcracker, and martens, deferring to their movement patterns and protecting their habitat from disturbance. Where appropriate for the species, not only should the presence of a motorized route be considered on the impact of each species, but also the level of anticipated use.

Moreover, some of the project area is located in high-altitude terrain. The whitebark pine in the alpine and subalpine zones of this project area could be impacted, and thus the species that depend on it, and should be considered when identifying motorized routes. Whitebark pine has been petitioned for listing as threatened under the Endangered Species Act ("ESA"). Please avoid ground disturbance in stands with healthy populations of whitebark pine, especially in stands with vigorous natural recruitment and conditions favorable to tree growth. Consider implementing restoration actions that reduce whitebark pine competitors and create suitable habitat for Clark's nutcracker caching.

Snake River steelhead, Chinook salmon and bull trout are all listed under the ESA. Their habitat needs protection from sediment delivery, such as from fording by motorized vehicles. As mentioned above, there are several important tributaries to the EFSF Salmon River in the project area that not only provide fisheries habitat, but also contribute to the presence and maintenance of fisheries habitat on the mainstem EFSF. The impacts of proposed routes and mitigation measures need to be considered on an ecosystem/watershed level.

2. Management actions, including motorized access management, need to be balanced with restoration.

Figure 5 of the Scoping Notice shows that an overwhelming majority of the project area--97%--falls into Management Prescription Categories ("MPC") 3.1 and 3.2, which are to be managed with either passive or active "restoration and maintenance of aquatic, terrestrial, and hydrologic resources," respectively. According to the Payette National Forest Land and Resource Management Plan ("Forest Plan"), road construction or reconstruction in MPC 3.1 may only occur where needed:

- a) to provide access related to reserved or outstanding rights, or
- b) to respond to statute or treaty, or
- c) to address immediate response situations where, if action is not taken, unacceptable impact to hydrologic, aquatic, riparian or terrestrial resources, or health and safety, would result.

MPC 3.2 also allows road construction or reconstruction to occur where needed to “support aquatic, terrestrial, or watershed restoration activities.”

SSFS supports any watershed improvement actions, including decommissioning and further stabilizing roadbeds where necessary to improve watershed conditions. Allowing these roads to naturally reclaim themselves, or where needed, provide management actions to support restoration activities, is consistent with the Forest Plan’s designation of these areas as passive or active restoration areas.

As stated in the scoping notice, numerous roads across the project area were built to access various mining areas, but have since been abandoned. Some areas have had restoration work performed, such as in the Thunder Mountain area; many of these roads are revegetating naturally. The maps in the scoping notice do not indicate which of these roads are currently being used, and which are not. We, however, do not support the reconstruction of old, abandoned roads that are already undergoing natural reclamation. The 70 miles of unused mining roads should not be opened to motorized use; please evaluate the revegetation status of these roadbeds to determine appropriate decommissioning treatments. We also do not support any potential Forest Plan amendment that would implement project-specific actions related to opening old roads to motorized access.

3. Impacts of motorized use and watershed improvement offsets should be considered on a watershed basis.

The EFSF RAMP project area proposes to designate trails for motorized use as well as implement watershed rehabilitation actions. As noted in the scoping notice, these management actions are proposed to occur in both the EFSF Salmon River watershed and the non-wilderness portion of the upper Monumental Creek watershed (Thunder Mountain area).

SSFS fully supports any watershed rehabilitation actions in either watershed. We note, however, that analysis of the impacts to motorized use and offsets from restoration or rehabilitation activities should be analyzed only within a single watershed such as within the

EFSF Salmon River separate from the upper Monumental Creek drainage within the Middle Fork Salmon River watershed.

4. Roads to mining claims that are not under an approved Plan of Operations should be rehabilitated.

It is unclear whether this recommendation is applicable to any of the roads in the project area, but mining claimants have often maintained that such roads are necessary to access their claims. While a right of access is guaranteed, this does not necessarily extend to motorized access. Motorized access can be granted under an approved Plan of Operations. *See* 36 C.F.R. § 228.12. SSFS also notes that only after a “discovery” does a claimant acquire “the exclusive right of possession and enjoyment of all the surface included within the lines of their claim.” *See* 30 U.S.C. §§ 23, 26. Further, valid mining claims, prior to the issuance of a patent, shall not be used for any purpose other than those reasonably incident to prospecting, mining, or processing operations. *Id.* § 612(a). Thus, if mining claim access roads are not addressed in an active Plan of Operations or the claims they access are invalid because of the absence of valuable minerals, the roads, if deemed to be causing resource damage, should be closed and rehabilitated.

5. East Fork Yellow Pine Area (Figure 1)

The scoping notice proposes to designate the existing Quartz Creek Road as a system road to the Quartz Creek Bridge, and open a new motorized trail--open to all vehicles--for 3 miles up to the Red Mountain mining area. We have significant concerns over this proposed action. The lower reach of Quartz Creek is an important fisheries stream, providing bull trout spawning habitat. As stated above, it also provides clear, cold water to the EFSF that supports the existing habitat for ESA-listed and sensitive fish species.

The beginning of the Quartz Creek road is immediately adjacent to the EFSF with little to no buffer and likely has direct delivery of sediment at several points. Aggregate surfacing would likely be necessary to address this problem. The Quartz Creek bridge used to be in very poor condition, and would likely need to be upgraded before any motorized use is allowed. We recommend that full size motorized vehicle designation end at the bridge with a turnaround (with all appropriate erosion control features) constructed on the flat ground 100 yards downstream. The bridge should be equipped with a gate for closure during hunting season to provide for big game habitat security.

The proposed ATV loop above Quartz Creek around the top of what is referred to as Red Mountain should be limited to a single loop while the several spur roads off of that loop should be closed to motorized entry. Closure should be done with a short section of complete recontouring at the beginning of each spur. Rocks, gates, and signage are often ineffective. These spurs access mining claims that apparently are under an active Plan of Operations, however the actions approved under that plan are not known. If the operator requires motorized access to these claims for significant exploration activities (e.g. drilling), the short segments recontoured for closure could be easily reconstructed with heavy equipment.

Given the importance of Quartz Creek to the fisheries habitat of the EFSF, it is extremely important that if any motorized use occurs along Quartz Creek, sufficient erosion control be implemented with consideration given to the size and extent of potential vehicular traffic.

6. Yellow Pine/Profile Creek Area (Figure 2)

There are many user created trails in the Profile summit area around private land. Please take care in considering building any new motorized trail in the Wilson Mine area near Profile Summit.

There are 1.5 miles of user-created ATV trails in the Wilson Mine area. There are at least three points where these trails cross headwater tributaries of Profile Creek and two trail sections parallel to and in close proximity to these tributaries. If this is to be designated as a formal ATV route, particular attention to erosion control measures should be taken at these points to prevent sediment delivery to streams. If the loop trail is retained, the out-and-back trail segment that continues uphill to the southwest from the top of that loop should be designated as non-motorized. Any new construction should avoid impacts to whitebark pine.

7. Thunder Mountain Area (Figure 3)

Are there any stipulations regarding road access or management in the mineral withdrawal of the Thunder Mountain area or in the agreement with the Trust for Public Lands which transferred property to the Forest Service? If so, please post this information on the Project's weblink.

The Thunder Mountain area presents a host of watershed improvement opportunities. Access should be maintained to the Lookout Mountain trailhead, but some of the smaller spur roads that branch off of the main road should be obliterated. Some are already naturally overgrown and would not need any further treatment. Access to the Dewey Mine should be closed after all

necessary reclamation has been completed. Some work has been done there in the past and an extensive inventory of reclamation needs was completed in 2014. These plans addressed the various sources of sediment delivery to Mule Creek. If reclamation activities could be coordinated with other RAMP projects, that would be ideal.

Another major watershed improvement opportunity in the area is the reclamation maintenance of the Sunnyside pit. Of particular value would be revegetation and erosion control on approximately 12 acres of poorly revegetated ground that drains directly into the headwaters of Holy Terror Creek. As with the Dewey Mine, a very detailed plan to accomplish this work was completed in 2014, and should be available in Forest Service files.

8. Idaho Roadless Area Map

The IRA Map in the scoping notice indicates that a large majority of the project area is designated as Idaho Roadless Areas (“IRA”). As such, road construction and reconstruction is limited to instances, among other things, where the Regional Forester determines that “road realignment is needed to prevent irreparable resource damage that arises from the design location, use or deterioration of a road and cannot be mitigated by road maintenance.” 36 C.F.R. § 294.23(b).

The maps do not provide any indication of which roads are currently in use and which have been abandoned. SSFS, however, does not support the reconstruction of abandoned roads to provide motorized access unless realignment of a road would be beneficial for resource protection or meets the other criteria in 36 C.F.R. § 294.23(b) for road construction and reconstruction.

9. The maps are of poor quality

We found the maps describing the different project areas of poor quality. Maps provide critical context and are a functional tool to discerning complicated on-the-ground conditions. It was hard to identify the colors and symbols in the legends and match them up with the colors and symbols on the maps. It would also be helpful to label the maps according to the standard Forest Service maps. For example, adding in trailhead numbers from the Payette Forest map next to the “TH” symbol would help the reader orient themselves to where the trail is located on the ground. Furthermore, depiction of actual, on-the-ground conditions, for example, with indication of which roads are currently in use with those that have been abandoned, would give the reader a more accurate picture of how the disclosed changes either expand or reduce motorized access.

We encourage and anticipate that the maps in the Environmental Assessment will make it clear what changes are proposed between on-the-ground conditions and the proposed alternatives.

Conclusion

The Big Creek/Yellow Pine Collaborative recommendations should be a studied alternative in the EA. Although we agree with some of the collaborative's recommendations, we have significant concerns with apparently insufficient resource protection actions.

We appreciate your careful consideration of our comments. We look forward to reviewing the forthcoming environmental assessment.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Coriell". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Fred Coriell
for the Board of Directors
Save the South Fork Salmon
savethesouthforksalmon@gmail.com